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8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **OAKLAND DIVISION**

11 Abdi Nazemian, et al.,

12 Plaintiffs,

13 vs.

14 NVIDIA Corporation,

15 Defendant.
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Master File Case No. 4:24-cv-01454-JST (SK)

**JOINT STIPULATION AND [PROPOSED]
ORDER RE DEADLINE TO IDENTIFY
CUSTODIANS**

1 Pursuant to the Court's October 15, 2025 Order (ECF 189), Plaintiffs Abdi Nazemian, Stewart
2 O'Nan, Brian Keene, Andre Dubus, III, and Susan Orlean (collectively, "Plaintiffs") and Defendant
3 NVIDIA Corp. ("Defendant") (together, "the Parties") jointly stipulate as follows:

4 WHEREAS, on October 10, 2025, Plaintiffs filed a Motion to Amend the Scheduling Order (ECF
5 186);

6 WHEREAS, on October 14, 2025, Defendant opposed Plaintiffs' Motion and requested that the
7 Court order a deadline by which Plaintiffs must identify all remaining NVIDIA ESI custodians (ECF
8 187);

9 WHEREAS, on October 15, the Court granted Plaintiffs' Motion to Amend the Scheduling Order
10 (ECF. 188);

11 WHEREAS, on October 15, 2025 at approximately 3:38 PM PT, the Court ordered the Parties to
12 submit either a jointly proposed deadline or competing proposed deadlines for Plaintiffs to identify all
13 remaining NVIDIA ESI custodians (ECF 189);

14 WHEREAS, on October 15, 2025 at approximately 6:30 PM PT, Plaintiffs identified seven
15 custodians and their respective search terms;

16 WHEREAS, the Parties have conferred and mutually agree that Plaintiffs will identify all
17 remaining NVIDIA ESI custodians as of right (of up to seven total remaining) and their respective
18 search terms on or before October 27, 2025;

19 WHEREAS, Plaintiffs agree that they will not use their identification of custodians and search
20 terms up to and including October 27, 2025 as a basis to seek a further extension of case deadlines;

21 THEREFORE, the Parties jointly submit October 27, 2025 as a deadline for Plaintiffs to identify
22 all remaining NVIDIA ESI custodians as of right.

1 DATED: October 17, 2025

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3 By: /s/Elisha Barron
Elisha Barron

By: /s/ Margaret H. Shyr
Margaret H. Shyr

4 Joseph R. Saveri (CSB No. 130064)
5 Christopher K.L. Young (CSB No. 318371)
6 Evan Creutz (CSB No. 349728)
7 Elissa A. Buchanan (CSB No. 249996)
8 William Waldir Castillo Guardado (CSB No.
294159)

JOSEPH SAVERI LAW FIRM, LLP

601 California Street, Suite 1505
9 San Francisco, CA 94108
Telephone: (415) 500-6800
10 Facsimile: (415) 395-9940
jsaveri@saverilawfirm.com
11 cyoung@saverilawfirm.com
12 ecreutz@saverilawfirm.com
13 eabuchanan@saverilawfirm.com
wcastillo@saverilawfirm.com

14 Bryan L. Clobes (admitted *pro hac vice*)
15 Alexander J. Sweatman (admitted *pro hac vice*)
16 Mohammed Rathur (admitted *pro hac vice*)

**CAFFERTY CLOBES MERIWETHER &
SPRENGEL LLP**

17 135 South LaSalle Street, Suite 3210
18 Chicago, IL 60603
Tel: 312-782-4880
19 bclobes@caffertyclobes.com
asweatman@caffertyclobes.com
20 mrathur@caffertyclobes.com

21 Justin A. Nelson (admitted *pro hac vice*)
22 Alejandra C. Salinas (admitted *pro hac vice*)
SUSMAN GODFREY L.L.P.

23 1000 Louisiana Street, Suite 5100
Houston, TX 77002-5096
24 Telephone: (713) 651-9366
jnelson@susmangodfrey.com
25 asalinas@susmangodfrey.com

26 Rohit D. Nath (SBN 316062)
27 **SUSMAN GODFREY L.L.P.**
1900 Avenue of the Stars, Suite 1400
28

**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**

Sean S. Pak (SBN 219032)
seanpak@quinnemanuel.com
50 California Street, 22nd Floor
San Francisco, CA 94111
Telephone: (415) 875-6600
Facsimile: (415) 875-6700

Andrew H. Schapiro (admitted *pro hac vice*)
andrewschapiro@quinnemanuel.com
191 N. Wacker Drive, Suite 2700
Chicago, Illinois 60606
Telephone: (312) 705-7400
Facsimile: (312) 705-4001

Alex Spiro (admitted *pro hac vice*)
alexspiro@quinnemanuel.com
51 Madison Avenue, 22nd Floor
New York, NY 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100

Rachael L. McCracken (SBN 252660)
rachaelmccracken@quinnemanuel.com
865 South Figueroa Street, 10th Floor
Los Angeles, CA 90017
Telephone: (213) 443-3000
Facsimile: (213) 443-3100

Margaret H. Shyr (SBN 300253)
margaretshyr@quinnemanuel.com
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, California 94065
Telephone: (650) 801-5000
Facsimile: (650) 801-5100

Attorneys for Defendant NVIDIA Corporation

1 Los Angeles, CA 90067-2906
2 Telephone: (310) 789-3100
RNath@susmangodfrey.com

3 Elisha Barron (admitted *pro hac vice*)
4 Craig Smyser (admitted *pro hac vice*)
5 **SUSMAN GODFREY L.L.P.**
6 One Manhattan West, 51st Floor
7 New York, NY 10019
Telephone: (212) 336-8330
ebarron@susmangodfrey.com
csmyser@susmangodfrey.com

8 Jordan W. Connors (admitted *pro hac vice*)
9 Trevor D. Nystrom (admitted *pro hac vice*)
10 **SUSMAN GODFREY L.L.P.**
11 401 Union Street, Suite 3000
12 Seattle, WA 98101
Telephone: (206) 516-3880
jconnors@susmangodfrey.com
tnystrom@susmangodfrey.com

13 Rachel J. Geman (*pro hac vice*)
14 Danna Z. Elmasry (*pro hac vice*)
15 **LIEFF CABRASER HEIMANN &**
16 **BERNSTEIN, LLP**
17 250 Hudson Street, 8th Floor
18 New York, NY 10013
Tel.: 212.355.9500
rgeman@lchb.com
delmasry@lchb.com

19 Anne B. Shaver
20 **LIEFF CABRASER HEIMANN &**
21 **BERNSTEIN, LLP**
22 275 Battery Street, 29th Floor
23 San Francisco, CA 94111
Tel.: 415.956.1000
ashaver@lchb.com

24 Betsy A. Sugar (*pro hac vice*)
25 **LIEFF CABRASER HEIMANN &**
26 **BERNSTEIN, LLP**
27 222 2nd Avenue S. Suite 1640
28 Nashville, TN 37201
Tel.: 615.313.9000
bsugar@lchb.com

1 David A. Straite (admitted *pro hac vice*)
2 **DiCELLO LEVITT LLP**
3 485 Lexington Avenue, Suite 1001
4 New York, NY 10017
5 Tel. (646) 933-1000
6 dstraite@dicellolevitt.com

7 Amy E. Keller (admitted *pro hac vice*)
8 Nada Djordjevic (admitted *pro hac vice*)
9 James A. Ulwick (admitted *pro hac vice*)
10 **DiCELLO LEVITT LLP**
11 Ten North Dearborn Street, Sixth Floor
12 Chicago, Illinois 60602
13 Tel. (312) 214-7900
14 akeller@dicellolevitt.com
15 ndjordjevic@dicellolevitt.com
16 julwick@dicellolevitt.com

17 Brian O'Mara (SBN 229737)
18 **DiCELLO LEVITT LLP**
19 4747 Executive Drive
20 San Diego, California 92121
21 Telephone: (619) 923-3939
22 Facsimile: (619) 923-4233
23 brian@dicellolevitt.com

24 Matthew Butterick (State Bar No. 250953)
25 1920 Hillhurst Avenue, #406
26 Los Angeles, CA 90027
27 Telephone: (323) 968-2632
28 Facsimile: (415) 395-9940
mb@buttericklaw.com

*Counsel for Individual and Representative
Plaintiffs and the Proposed Class*

[PROPOSED] ORDER

Pursuant to the stipulation of the Parties and the Court's Order (ECF 189), it is hereby ORDERED that Plaintiffs shall identify all remaining NVIDIA ESI custodians and their respective search terms on or before October 27, 2025.

IT IS SO ORDERED.

Dated: _____

The Honorable Jon S. Tigar
U.S. District Court Judge

ATTESTATION OF CONCURRENCE IN FILING PURSUANT TO CIVIL L.R. 5-1(i)(3)

This document is being filed through the Electronic Case Filing (ECF) system by attorney Margaret H. Shyr. By their signature, Margaret H. Shyr attests that she has obtained concurrence in the filing of this document from each of the attorneys identified in the above signature block.

Dated: October 17, 2025

By: /s/ DRAFT
Margaret H. Shyr